

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**Patrick-Joseph: Groulx**

**Case No. 2:25-cv-11667**

Plaintiff/Prosecutor

United States District Judge, Thomas L. Ludington  
United States Magistrate Judge, Patricia T. Morris

v.

**Takeda Pharmaceutical Company Limited,**

**Baxalta US Inc.,**

and

**BioLife Plasma Services LP,**

DEFENDANTS

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**Plaintiff's EXHIBIT LIST TO SUPPORT HIS COMPLAINT, MOTIONS,  
DISCOVERY REQUESTS, RESPONSES, OBJECTIONS AND REPLIES**

NOW COMES, Plaintiff, Patrick-Joseph Groulx hereby submits his exhibit list,  
reserving the right to amend it upon discovery of new information

1. Exhibit A: Photograph of Medical Device Display (January 14, 2023)

Description: A close-up image of a medical device, likely an infusion pump, displaying volume measurements: 885 mL and 883 mL. The device is shown with a blue border, and the background includes a beige surface, medical tubing, and a portion of a white textured surface. A label with the number "21" is visible in the background.

2. Exhibit B: Photograph of Medical Device Display (January 26, 2023)

Description: A close-up image of a medical device, likely an infusion pump, displaying two volume measurements: 896 mL and 894 mL. The device has a blue border and is placed on a beige surface with medical tubing visible in the background.

3. Exhibit C: Photograph of Medical Device Display (January 28, 2023)

Description: A close-up image of the same medical device, showing volume measurements of 882 mL and 884 mL, continuing the trend of decreasing volume. The device has a blue border, and the background remains consistent with prior exhibits and featuring a beige surface.

4. Exhibit D: Photograph of Medical Device Display (February 2, 2023)

Description: A close-up image of the same medical device, displaying volume measurements of 895 mL and 893 mL, indicating a further decrease in volume consistent with the pattern observed in prior exhibits. The device maintains its blue border, and the background includes beige surface, medical tubing.

5. Exhibit E: Photograph of Medical Device Display (February 4, 2023)

Description: Another close-up image of the same medical device, showing volume measurements of 896 mL and 894 mL, consistent with Exhibit A.

The device is positioned on a beige surface with medical tubing.

6. Exhibit F: Declaration of Patrick-Joseph: Groulx to authenticate Exhibits A-E

7. Exhibit G: Notice of Intent sent to Baxter International now known as Baxalta US Inc. dated July 16, 2023

8. Exhibit H: Notice of Intent sent to BioLife dated July 16, 2023

9. Exhibit I: Notice of Intent sent to Takeda Pharmaceutical Company, now known as Takeda Pharmaceutical Company Limited, dated July 16, 2023

Respectively submitted by:

/s/ Patrick-Joseph: Groulx  
Patrick-Joseph: Groulx  
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Date: June 7, 2025

# EXHIBIT A







## EXHIBIT B

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